

The Seattle Times



July 30, 2010

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AUG 02 2010

Judge John Coughenour
U.S. District Court
Western District of Washington
700 Stewart Street, Suite 16229
Seattle, WA 98101-9906

U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
DEPUTY

Dear Judge Coughenour:

I'm writing to request the Court consider unsealing exhibits to a pleading filed in the case of *Lacey Carroll vs. David Seth Kotkin, aka David Copperfield*, No. C09-1076JCC.

Specifically, I'm asking the court to remove the seal from Exhibits 1 and 2 attached to a declaration filed by plaintiff's counsel, Rebecca Roe (see Dkts #51-54 inclusive). I am relying on Local Rule 5(g)(2), which memorializes this District's commitment to the strong presumption that the court's business, and files, are public.

The documents were sealed pursuant to a stipulated protective order under Local Rule 26(c). Local Rule 5(g)(6) states the seal can be lifted by this court "upon stipulation of the parties, motion by any party or intervenor, or by the court after notice to the parties." Opponents to unsealing must show that the "interests of the parties in protecting files, records, or documents from public review continue to outweigh the public's right of access." Rule 5(g)(3) states that, wherever possible, "a party should protect sensitive information by redacting documents rather than seeking to file them under seal. A motion or stipulation to seal should include an explanation of why redaction is not feasible."

I respectfully ask the Court to review the protective order in this case, and the files themselves, to determine to what extent, if any, redactions or other measures could be used to protect the privacy considerations cited by plaintiff's counsel and allow the Court to meet the "strong presumption of public access to the Court's files."

I have spoken to counsel about my intentions. Ms. Roe said she would not oppose unsealing the documents. Mr. Angelo Calfo, for Mr. Copperfield, represented that he would discuss it with his client.

I appreciate the Court's time and consideration.

Respectfully,

Mike Carter
The Seattle Times
P.O. Box 70
Seattle, WA 98111
206-464-3706

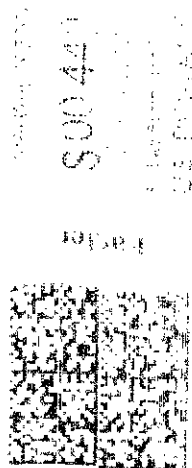
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09-CV-01076-LTR

cc: Ms. Rebecca Roe
Mr. Angelo Calfo

The Seattle Times

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CLERK U.S. DISTRICT COURT
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